

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Debbie Edwards	:	Chapter 13
	:	No.: 19-16421-AMC
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY TOYOTA MOTOR CREDIT CORPORATION

Debtor, Debbie Edwards, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Toyota Motor Credit Corporation hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. No response required.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied.
10. Debtor is unsure of the same.
11. Admitted.
12. Denied. Debtor avers all payments were made to date.
13. Denied.
14. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: June 30, 2021

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Keri P. Ebeck**  
Electronic Notice  
Attorney for Movant

Dated: June 30, 2021

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
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